4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

4.1 Introduction to the Environmental Analysis

This SEIR/SEIS analyzes the environmental impacts associated with the addition of marker balls to T/L spans (catenaries) and lights to transmission structures, as well as modifications to certain transmission structures in Segment 8, Phase 3, between the Chino and Mira Loma Substations to meet FAA recommendations. This chapter includes the following sections:

- Section 4.2, Air Quality
- Section 4.3, Biological Resources
- Section 4.4, Noise
- Section 4.5, Visual Resources
- Section 4.6, Traffic and Transportation

4.1.1 Impact Analysis Approach

The analysis focuses on the effects of the proposed changes to the Approved Project. Impacts unrelated to these changes will not be discussed. In evaluating the changes, the impact analysis will focus on the following questions:

- Will the Project changes result in impacts not already identified in the Final EIR and/or Final EIS? If there are any new impacts, are they significant?
- Will the Project changes substantially increase the severity of any significant impacts identified in the Final EIR and/or Final EIS?
- Is there additional feasible mitigation available to reduce or avoid the significant impacts associated with the Project changes?

Those issue/resource areas for which it was determined that none of the above conditions would apply are presented in Section 1.6.2, Issue Areas Not Addressed in the SEIR/SEIS.

4.1.2 Environmental Baseline

For a SEIR/SEIS, the environmental baseline is different than a regular EIR/EIS. In a regular EIR/EIS, the baseline is the existing environmental condition in the Project area. Changes caused by the Project are compared to this baseline in order to identify impacts. However, for a SEIR/SEIS, the baseline for the impact analysis consists of environmental conditions with full implementation of the Approved Project. Therefore, the impacts are determined by comparing the impacts of the Approved Project (identified in the Final EIR and Final EIS, and in CPUC Decision 09-12-044) to the impacts of the Approved Project with the implementation of the proposed modifications. As such, the analyses presented in Sections 4.2 through 4.6 identify the difference in impacts between the Approved Project and the Modified Project.

The "Environmental Setting" within Sections 4.2 through 4.6 of this SEIR/SEIS briefly discuss current environmental conditions in order to describe important changes that may have occurred since publication of the Final EIR (October 2009) and Final EIS (September 2010). An example of an important change would be the discovery of a new sensitive species in the Project area that was not known when the Final EIR and Final EIS were prepared. Another example would be the construction of new land uses in close proximity to the project that have introduced new sensitive receptors to the area.

4.1.3 Impact Significance Categories

For the purposes of CEQA compliance, the significance of each identified impact of the Project has been determined. The CEQA Lead Agency (CPUC) is responsible for determining whether an impact is significant and is required to adopt feasible mitigation measures to minimize or avoid each significant impact. A series of criteria, identified in the "Impact Analysis Methodology" section for each issue/resource area, are used to help the CEQA Lead Agency gauge the significance of each impact.

In order to provide for a comprehensive and systematic evaluation of potential environmental impacts to the issue area categories, a classification system has been applied to the impacts of the Project. These classifications indicate whether an identified impact is significant and whether mitigation measures can reduce the severity of the impact to a level that is not significant. The following classifications were uniformly applied to each identified impact:

- **Class I: Significant impact; cannot be mitigated to a level that is not significant.** Class I impacts are significant adverse effects that cannot be mitigated below a level of significance through the application of feasible mitigation measures. Class I impacts are significant and unavoidable.
- **Class II: Significant impact; can be mitigated to a level that is not significant.** A Class II impact is a significant adverse effect that can be reduced to a less than significant level through the application of feasible mitigation measures presented in this EIR/EIS.
- **Class III: Adverse; less than significant.** A Class III impact is a minor change or effect on the environment that does not meet or exceed the criteria established to gauge significance.
- **Class IV: Beneficial impact.** Class IV impacts represent beneficial effects that would result from project implementation.

In cases where there is a potential for a certain type of impact, but no such impact would occur for the Project, the reasons for no occurrence of an impact are described and "no impact" classification is assigned.

A significant impact is defined by CEQA as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (State CEQA Guidelines Section 15382). Significance criteria serve as a benchmark for determining if a project action will result in a significant adverse environmental impact when evaluated against the baseline. Although guidance provided by CEQA are used to help determine the significance of impacts, the determination of impact significance is based on the independent judgment of the Lead Agency. The establishment of any criteria used to evaluate the significance of impacts is also the responsibility of the Lead Agency. Criteria used to determine the significance of the Project's impacts with implementation of the proposed modifications are presented in the sections addressing individual environmental issue areas (Sections 4.2 through 4.5). Some impact categories in this document lend themselves to scientific or mathematical analysis and, therefore, to quantification, while others are more qualitative, and resources such as Air Quality have significance thresholds that are established by regulatory agencies.

The impact categories described above are only applicable under CEQA. The framework for discussion of significance is different under NEPA. It requires consideration of an impact's context and intensity, including 10 defined factors to consider in assessing the intensity (40 CFR 1508.27). NEPA does not require that impacts be placed into any category, only that all environmental effects of an action be considered in terms of their context and intensity. The discussion of impacts in Chapter 4 is intended to meet the requirements of both NEPA and CEQA.

4.1.4 Cumulative Impact Analysis

Cumulative impacts are the impacts on the environment that result from the incremental impacts of the Approved Project with implementation of the proposed modifications when considered with other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time." 40 CFR §1508.7. Under NEPA, both context and intensity are considered in determining significance. Among other considerations when considering intensity is "[w]hether the action is related to other actions with individually minor but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." 40 CFR §1508.27(b)(7).

Under the State CEQA Guidelines, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." 14 Cal Code Regs §15130(a)(1). An EIR must discuss cumulative impacts if the incremental effect of a project, combined with the effects of other projects is "cumulatively considerable." 14 Cal Code Regs §15130(a). Such incremental effects are to be "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." 14 Cal Code Regs §15164(b)(1). Together, these projects comprise the cumulative scenario which forms the basis of the cumulative impact analysis. All reasonably foreseeable future projects located within the geographic extent of the Modified Project have been considered as part of the cumulative analysis; these projects are detailed in Section 3.

In order to understand the contribution of past actions to the cumulative effects of the Modified Project, the analysis of cumulative impacts presented for each issue area relies on current environmental conditions as a proxy for the impacts of past actions. This is because existing conditions reflect the aggregate impact of all prior human actions and natural events that have affected the environment and might contribute to cumulative effects.

The cumulative effects analyses do not attempt to quantify the effects of past human actions by adding up all prior actions on an individual basis. There are several reasons for not taking this approach. First, a catalog and analysis of all past actions would be impractical to compile and unduly costly to obtain. Current conditions have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Second, providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. In fact, focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. By looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects. Third, the Council on Environmental Quality (CEQ) issued an interpretive memorandum on June 24, 2005, regarding analysis of past actions, which states, "agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions."

The cumulative effects analysis in this SEIR/SEIS is also consistent with Forest Service NEPA Regulations (36 CFR 220.4(f)) (July 24, 2008), which state, in part:

> *CEQ regulations do not require the consideration of the individual effects of all past actions to determine the present effects of past actions. Once the agency has identified those present effects of past actions that warrant consideration, the agency assesses the extent that the effects of the proposal for agency action or its alternatives will add to, modify, or mitigate those effects. The final analysis documents an agency assessment of the cumulative effects of the actions considered (including past, present, and reasonable foreseeable future actions) on the affected environment. With respect to past actions, during the scoping process and subsequent preparation of the analysis, the agency must determine what information regarding past actions is useful and relevant to the required analysis of cumulative effects. Cataloging past actions and specific information about the direct and indirect effects of their design and implementation could in some contexts be useful to predict the cumulative effects of the proposal. The CEQ regulations, however, do not require agencies to catalogue or exhaustively list and analyze all individual past actions. Simply because information about past actions may be available or obtained with reasonable effort does not mean that it is relevant and necessary to inform decision-makers. (40 CFR 1508.7)*

Past actions in the cumulative analysis area include projects such as commercial, residential, and infrastructure developments in the North and South Regions and infrastructure, fuels reduction, fire management, and recreational facility development in the Central Region as well as natural events such as fires, floods, and earthquakes. Most of these types of actions are ongoing in the analysis area, and the types of impacts associated with them are evident in current conditions and continue to occur. For these reasons, the analysis of past actions is based on current environmental conditions.